

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

STATE OF LOUISIANA, *et al.*,

Plaintiffs,

v.

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Defendant.

Case No. 2:24-cv-629

UNITED STATES CONFERENCE OF
CATHOLIC BISHOPS, *et al.*,

Plaintiffs,

v.

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION, *et al.*,

Defendants.

Case No. 2:24-cv-691

**DEFENDANTS' MOTION TO DISMISS OR, IN THE ALTERNATIVE,
FOR SUMMARY JUDGMENT**

The Equal Employment Opportunity Commission (EEOC) and Charlotte Burrows, Chair of the EEOC (jointly “Defendants”),¹ hereby move to dismiss or, in the alternative, for summary judgment. Because the Court lacks subject-matter jurisdiction over Plaintiffs’ claims, this case should be dismissed under Rule 12(b)(1). In the alternative, the Court should enter judgment for Defendants under Rule 56. A proposed order is enclosed herein.

¹ Ms. Burrows is listed as an official capacity defendant only in *U.S. Conference of Catholic Bishops, et al. v. EEOC, et al.*, (“USCCB”) No. 2:24-cv-691.

Dated: October 10, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

EMILY B. NESTLER
Assistant Branch Director

DANIEL SCHWEI
Special Counsel

/s/ Laura B. Bakst
LAURA B. BAKST (D.C. Bar #1782054)
ALEXANDRA WIDAS (D.C. Bar #1645372)
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20005
Tel: (202) 514-3183
Facsimile: (202) 616-8460
Email: Laura.b.bakst@usdoj.gov

Counsel for Defendants